

APPL.NO. 482325, 482328,
482329, 482330,
482331, 482332,
482333, 493549,
495358.

ENGINEERING AND COMPLIANCE DIVISION

PROCESSED BY: R. Singh

CHECKED BY

APPLICATION PROCESSING AND CALCULATION

DATE

09/30/09

PERMIT TO CONSTRUCT/OPERATE EVALUATION,

Applicant's Name

S.A. RECYCLING LLC DBA ADAMS STEEL

Company I.D.

153095

Mailing Address

3200 EAST FRONTERA ST., ANAHEIM, CA 92806

Equipment Address

3200 EAST FRONTERA ST., ANAHEIM, CA 92806

EQUIPMENT DESCRIPTION:APPLICATION NO. 482325

STORAGE SILO NO.1, CEMENT, DIVERSIFIED STORAGE SYSTEMS, MODEL 266PJ, 12'-0" DIA. X 41'-5" H., 100 TON CAPACITY, WITH A FILTER VENT, 266 SQ FT TOTAL FILTER AREA.

APPLICATION NO. 482328

STORAGE SILO NO. 2, CEMENT, DIVERSIFIED STORAGE SYSTEMS, MODEL 266PJ, 12'-0" DIA., X 41'-5" H., 100 TON CAPACITY, WITH A FILTER VENT, 266 SQ FT TOTAL FILTER AREA.

APPLICATION NO. 495358

STORAGE SILO NO. 3, CEMENT, DIVERSIFIED STORAGE SYSTEMS, MODEL PD-TANK-250, 12'-0" DIA., X 28'-2" H., 82 TON CAPACITY.

APPLICATION NO. 482329

CEMENT BLENDING SYSTEM CONSISTING OF:

1. SCREW CONVEYOR, CSF1-A, 0'-7" DIA. X 17'-0" L., 5 H.P.
2. SCREW CONVEYOR, CSF1-B, 0'-7" DIA. X 17'-0" L., 5 H.P.

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3. BLENDING SCREW CONVEYOR, TSF1, 4'-0" DIA. X 16'-5" L., 5 H.P.
4. BELT CONVEYOR, TBC3, 3'-0" W. X 48'-0" L., 20 HP.
5. BELT CONVEYOR, TBC10, 3'-0" W. X 85'-0" L., 25 HP.
6. STORAGE TANK, POTASSIUM / SODIUM SILICATE WATER MIXTURE, 1,000- GALLON CAPACITY.

APPLICATION NO. 482330

RECYCLED MATERIAL CONVEYING SYSTEM # 1 CONSISTING OF:

1. BELT CONVEYOR, 5'-0" W. X 50'-5" L., 15 HP.
2. SHAKER, 8'-0" W. X 22'-0" L., 25 H.P.

APPLICATION NO. 482331

RECYCLED MATERIAL CONVEYING SYSTEM # 2 CONSISTING OF:

1. BELT CONVEYOR, 5'-0" W. X 50'-5" L., 15 HP.
2. SHAKER, 8'-0" W. X 22'-0" L., 25 H.P.

APPLICATION NO. 482332OIL / WATER SEPARATOR, GREAT LAKES ENVIRONMENTAL, MODEL NO. WATERRLINK 100,
3'-8 1/2" W. X 8'-8" L. X 7'-2" H.**BACKGROUND:**

This is a Title V facility is engaged in shredding of scrap metal, including scrap automobiles; scrap appliances, metal pipes, metal drums, and metal machinery. These applications were received on 5/6/08 for a cement blending plant (A/N 482329), two identical cement storage silos (A/Ns 482325 and 482328), two identical material conveying systems (A/Ns 482330 and 482331), and an oil / water separator plant (A/N 482332). A/N 482333 was received on 5/2/08 for revision of Title V permit. A/N 495358 was received on 02/05/09 for a third Storage Silo along with A/N 493549 for Title V permit revision. All of this equipment is installed and the applications were submitted with 50 % penalty on fee for operating without permit.

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A check of the compliance data showed one NOV (# P47594) was issued to this facility on 10/7/08 for exceeding throughput during June, July, and August of 2008. An inspection performed on 8/21/09 indicates that the facility was operating in compliance. There are no schools within 1000 feet of this facility.

PROCESS DESCRIPTION:

The three silos are used to store dry cement for use in the cement blending plant. Silo # 3 is the "slave silo" which serves silos # 1 & 2. The silos are loaded pneumatically from delivery trucks. Silo #s 1 & 2 are vented to individual filter vents, integral to each silo, using air flow created by material transfer. Silo # 3 is vented to silo #s 1 & 2.

The blending plant mixes the auto shredder residue or fluff with cement before disposal. Cement from the storage silos is transferred through screw conveyors into a blending screw conveyor. After separating all the ferrous and non-materials, the auto shredder residue or fluff is transferred through belt conveyors to the blending screw conveyor. The blended material is discharged through belt conveyors to stockpiles for disposal.

The two conveying systems are used to transfer recycled metals to containers for shipping off-site. Recycled metals are loaded into a vibrating table and transferred to a belt conveyor that transfers the material into waiting containers.

The oil water separator is used to remove oil from industrial grey water before using to cool the shredder. See the attached letter from Remedy Environmental Services for a detailed process description. Industrial grey water is delivered to the facility by trucks and stored in a closed holding tank. Grey water is pumped into the oil water separator from the holding tank. It removes oil to less than 50 ppm and solids to less than 1 micron. Clean water is gravity discharged into a holding tank before use in the shredder for cooling.

EMISSION CALCULATIONS:

Application Nos 482325 and 482328 (Identical Silos)

The two silos are identical. According to the applicant, each load of truck is 56,000 lbs and it takes about 60 minutes to unload the truck to the silo. Each silo is loaded twice a day, 6 times every week. The following apply to **each silo**.

Cement delivery rate = 56,000 lbs / hr
 = 28 tons / hr

Throughput = 28 tons / hr x 1 hr / delivery x 2 deliveries / day x 6 days / wk x 4.33 wks / month
 = 1450 tons / month (**permit condition**)

The following emission factors are used from EPA A-42, Table 11.12-2,

PM (uncontrolled)-cement = 0.72 lb./ ton
PM10 (uncontrolled)-cement = 0.46 lb./ ton

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$$\begin{aligned} \text{R1 (PM)} &= 0.72 \text{ lb./ ton} \times 28 \text{ tons / hr} \\ &= 20.16 \text{ lbs./ hr.} \end{aligned}$$

$$\begin{aligned} \text{R1 (PM10)} &= 0.46 \text{ lb./ ton} \times 28 \text{ tons / hr} \\ &= 12.88 \text{ lbs./ hr.} \end{aligned}$$

Assuming each filter vent has a control efficiency of 99 %

$$\begin{aligned} \text{R2 (PM)} &= 20.16 \times (1-0.99) \text{ lb./ hr.} \\ &= 0.20 \text{ lb./ hr.} \end{aligned}$$

$$\begin{aligned} \text{R2 (PM10)} &= 12.88 \times (1-0.99) \text{ lb./ hr.} \\ &= 0.13 \text{ lb./ hr.} \\ &= 0.13 \text{ lb / hr} \times 1 \text{ hr / delivery} \times 2 \text{ deliveries / day} \\ &= 0.26 \text{ lb / day (maximum)} \\ &= 0.26 \text{ lb / day} \times 6 \text{ days / wk} \times 4.33 \text{ wks / month} \\ &= 6.75 \text{ lb / month} \\ &= (6.75 \text{ lb / month}) / 30 \text{ days / month} \\ &= 0.225 \text{ lb / day (30-day average)} \end{aligned}$$

$$\begin{aligned} \text{Maximum annual R2 (PM 10)} &= 6.75 \text{ lb / month} \times 12 \text{ months / yr} \\ &= 81 \text{ lbs / yr} \end{aligned}$$

AEIS & NSR Emission Data (each silo)

$$\begin{aligned} \text{R1 (PM10)} &= 12.88 \text{ lb./ hr.} \\ \text{R2 (PM10)} &= 0.13 \text{ lb./ hr.} \end{aligned}$$

$$\text{30-day average R2 (PM10)} = 0.225 \text{ lb./ day - as calculated above}$$

$$\text{Maximum annual R2 (PM10)} = 81 \text{ lbs / yr - as calculated above.}$$

Application No 495358 (Storage Silo # 3)

According to the applicant, each load of truck is 56,000 lbs and it takes about 60 minutes to unload the truck to the silo. The silo is loaded once a day, 6 times every week.

$$\begin{aligned} \text{Cement delivery rate} &= 56,000 \text{ lbs / hr} \\ &= 28 \text{ tons / hr} \end{aligned}$$

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Throughput = 28 tons / hr x 1 hr / delivery x 1 delivery / day x 6 days / wk x 4.33 wks / month
= 750 tons / month (**permit condition**)

The following emission factors are used from EPA A-42, Table 11.12-2,

PM (uncontrolled)-cement = 0.72 lb./ ton

PM10 (uncontrolled)-cement = 0.46 lb./ ton

R1 (PM) = 0.72 lb./ ton x 28 tons / hr
= 20.16 lbs./ hr.

R1 (PM10) = 0.46 lb./ ton x 28 tons / hr
= 12.88 lbs./ hr.

This silo is vented to silos # 1 & 2, which are equipped with filter vents. Assuming each filter vent has a control efficiency of 99 %

R2 (PM) = 20.16 x (1-0.99) lb./ hr.
= 0.20 lb./ hr.

R2 (PM10) = 12.88 x (1-0.99) lb./ hr.
= 0.13 lb./ hr.
= 0.13 lb / hr x 1 hr / delivery x 1 delivery / day
= 0.13 lb / day (maximum)
= 0.13 lb / day x 6 days / wk x 4.33 wks / month
= 3.38 lb / month

AEIS & NSR Emission Data

R1 (PM10) = 12.88 lb / hr.

R2 (PM10) = 0.13 lb / hr.

30-day average R2 (PM10) = (0.13 lb / hr x 1 hr / day x 6 days / wk x 4.33 wks / month) / 30
= 0.11 lb / day (30-day average)

Maximum annual R2 (PM 10) = 0.13 lb / hr x 1 hr / day x 6 days / wk x 52 wks / yr
= 41 lbs / yr

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Application No. 482329 (Blending Plant)

The following information is provided by the applicant (attached email):

Cement Usage = 3600 tons / month (permit condition)
= 120 tons / day

Fluff processed = 35,000 tons / month (permit condition)
= 1167 tons / day

Operating hours = 24 hrs / day, 7 days / wk, 52 wks / yr

Cement is transferred by screw conveyors from the three silos to the blending screw conveyor. All screw conveyors are enclosed. After mixing, the material is wet. Therefore, fugitive PM10 emissions will be negligible.

The following emission factors from AP-42, Table 11.12-2 (concrete batching) are used in the calculations below:
Since all conveyors are enclosed, use of these emission factors is conservative.

Cement transfer-PM10- uncontrolled = 0.46 lb / ton
Cement transfer-PM10- controlled = 0.00034 lb / ton

Belt conveyor transfer point – fluff – PM10 uncontrolled = 0.0033 lb./ ton (PM)
Belt conveyor transfer point – fluff – PM10 controlled = 0.00033 lb./ ton (PM) (assumed 90% efficiency for control by water spray)

TRANSFER PT.	MATERIAL	THPUT tons/day.	R1 (PM10) lb/day	R2 (PM10) lb/day
Loading of cement from three silos to the blending screw conveyor	cement	120	55.2	0.0408
Transfer of fluff by belt conveyor to the blending screw conveyor	fluff	1167	3.85	0.385
Blending screw conveyor to belt TBC3	Mix	1287	4.25	0.425
Belt TBC3 to belt TBC10	Mix	1287	4.25	0.425
Total PM10 emissions			67.55	1.28
R1 (PM10)	= 67.55 lbs./ day			

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= 2.81 lbs./ hr. @ 24 hrs./ day

R2 (PM10) = 1.28 lbs / day
= 0.05 lbs./ hr. @ 24 hrs./ day

Assuming PM10 = 50 % of PM

R1 (PM) = 2 x 2.81 lb./ hr.
= 5.62 lb./ hr

R2 (PM) = 2 x 0.05 lb./ hr.
= 0.10 lb./ hr.

AEIS & NSR Emission Data

R1 (PM10) = 2.81 lbs / hr.

R2 (PM10) = 0.05 lb / hr.

30-day Average R2 (PM10) = (0.05 lb. / hr. x 24 hrs. /day x 7 days/ wk x 4.33 wks / month) / 30
= 1.21 lb / day

Annual Average R2 (PM10) = (0.05 lb. / hr. x 24 hrs. /day x 7 days/ wk. x 52 wks. / yr.)
= 437 lbs. / yr.

Application No. 482330 & 482331 (Identical Material Conveying Systems)

The following information is provided by the applicant:

Throughput = 56,000 tons / month (**permit condition**)
= 1850 tons / day

Operating Hours = 24 hrs / day, 7 days / wk, 52 wks / yr

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The following emission factors from AP-42, Table 11.12-2 (concrete batching) are used in the calculations below:

Belt conveyor transfer point – PM10 uncontrolled = 0.0033 lb./ ton (PM)
Belt conveyor transfer point – PM10 controlled = 0.00033 lb./ ton (PM) (assumed 90 % control efficiency for water spray)

TRANSFER PT.	THPUT tons/day.	R1 (PM10) lb/day	R2 (PM10) lb/day
Shaker table to Belt conveyor	1850	6.11	0.61
Belt conveyor to truck	1850	6.11	0.61
Total		12.22	1.22.

AEIS & NSR Emission Data (each conveying system)

R1 (PM10) = 12.22 lb / day
= 0.51 lb / hr

R2 (PM10) = 1.22 lb / day
= 0.05 lb / hr

30-day average R2 (PM10) = (1.22 lb / day x 7 days / wk x 4.33 wks / month) / 30
= 1.23 lb / day

Maximum annual R2 (PM10) = 1.22 lb / day x 7 days / wk x 52 wks / yr
= 444 lbs / yr

Application No. 482332 (Oil / Water Separator)

The following information is provided by the applicant:

Grey water processed = 10,000 gal / day
= 10,000 gal / day x 4 days / wk x 4.33 wks / month
= 173,200 gal / month (**permit condition**)

Operating hours = 2 hrs / day, 4 days / wk, 40 wks / yr

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Average amount of non-emulsified oil in grey water = 10 mg / liter (from the previous evaluation of this equipment, A/N 372211)

Oil removed per day = (10,000 gal / day x 10 mg / lt x 3.785 lt / gal) / 1000 mg / gm
= 378.5 gm / day
= 0.83 lb/ day
= 0.42 lb / hr @ 2 hrs of operation per day

This amount of oil will be considered as the worst case VOC emissions from this equipment.

AEIS & NSR Emission Data

R1 = R2 (VOC) = 0.42 lb./ hr.

30-day average R2 (VOC) = (0.83 lb / day x 4 days / wk x 4.33 wks / month) / 30
= 0.48 lb / day

Maximum annual R2 (VOC) = (0.83 lb./ day x 4 days / wk x 40 wks / yr
= 132.80 lbs / yr

RULES

RULE 212 The facility is not located within 1000 feet of a school. Rule 1401 risk will not be greater than one in a million. The emissions from this equipment do not exceed the limits in section (g) of this rule. Therefore, a public notice is not required.

RULE 401 Visible emissions are not expected with proper maintenance and operation of this equipment. Compliance is expected.

RULE 402 Operation of this equipment is not expected to create a nuisance. Compliance is expected.

RULE 404 As shown in the above calculations, the PM emissions are small in all cases and PM concentrations are not expected to exceed the allowable concentration per Table 404 (a) of this rule. Compliance is expected.

RULE 405 The expected PM emission rates in all cases are very small compared to the allowable PM emission rates) in Table 405(a) of this rule. Compliance is expected.

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REG. XIII

New Source Review:

Subparagraph 1303(a) – BACT:

Each silo is vented to a filter vent.
On other equipment, PM emissions are controlled by water spray
BACT requirements are satisfied.

Subparagraph 1303(b) (1) – Modeling

PM10 emission in all cases is less than 0.41 lb / hr screening limit specified in this rule. Therefore, modeling is not required.

Subparagraph 1303(b) (2) – Offsets

VOC emission from the oil/water separator is 0.48 lb / day, which is less than 0.5 lb / day.

As shown in the attached table, the calculated PM10 emission from all the permitted equipment in this facility is 4877 lbs (2.44 tons) per year, which is less than 4 tons / yr. As a result, offsets are not required.

RULE 1401

Review of Toxic Air Contaminants

No toxic emissions are expected from this operation. This rule does not apply.

RULE XXX

Title V Permits

This is a “de minimis significant permit revision” to the Title V permit. EPA 45-day review is required.

CONCLUSIONS/RECOMMENDATIONS:

The equipment is expected to comply with all the AQMD rules and regulations. Issue POs subject to permit conditions listed below:

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495358.**ENGINEERING AND COMPLIANCE DIVISION****PROCESSED BY:** R. Singh**CHECKED BY****APPLICATION PROCESSING AND CALCULATION****DATE****09/30/09****Conditions:**Application Nos. 482325 & 482328 (Identical Cement Silos # 1 & 2)

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THE TOTAL QUANTITY OF CEMENT RECEIVED AND STORED BY THIS EQUIPMENT SHALL NOT EXCEED 1450 TONS IN ANY ONE CALENDAR MONTH.
4. THE FILTER BAGS IN THE SILO FILTER VENTS SHALL BE THOROUGHLY CLEANED IMMEDIATELY AFTER EACH LOAD OF MATERIAL IS RECEIVED.
5. RECORDS SHALL BE MAINTAINED TO PROVE COMPLIANCE WITH THE ABOVE PERMIT CONDITIONS. THE RECORDS SHALL BE KEPT FOR A MINIMUM OF THE LAST TWO YEARS AND SHALL BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

Application No. 482329 (Cement Blending)

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THE TOTAL QUANTITY OF DRY CEMENT PROCESSED IN THIS EQUIPMENT SHALL NOT EXCEED 3600 TONS IN ANY ONE CALENDAR MONTH.
4. THE TOTAL QUANTITY OF AUTO SHREDDER RESIDUE (ASR) PROCESSED IN THIS EQUIPMENT SHALL NOT EXCEED 35,000 TONS IN ANY ONE CALENDAR MONTH.
5. THE ROADWAYS, ASR CHARGED, AND ASR IN PROCESS SHALL BE KEPT SUFFICIENTLY MOIST TO PREVENT EXCESSIVE DUST EMISSIONS.

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- RECORDS SHALL BE MAINTAINED TO PROVE COMPLIANCE WITH THE ABOVE PRERMIT CONDITIONS. THE RECORDS SHALL BE KEPT FOR A MINIMUM OF THE LAST TWO YEARS AND SHALL BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

Application Nos. 482330 & 482331 (Identical Misc. Conveying Systems)

- OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
- THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
- THE TOTAL QUANTITY OF MATERIAL PROCESSED IN THIS EQUIPMENT SHALL NOT EXCEED 56,000 TONS IN ANY ONE CALENDAR MONTH.
- THE ROADWAYS, MATERIAL CHARGED, AND MATERIAL IN PROCESS SHALL BE KEPT SUFFICIENTLY MOIST TO PREVENT EXCESSIVE DUST EMISSIONS.
- RECORDS SHALL BE MAINTAINED TO PROVE COMPLIANCE WITH THE ABOVE PRERMIT CONDITIONS. THE RECORDS SHALL BE KEPT FOR A MINIMUM OF THE LAST TWO YEARS AND SHALL BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

Application Nos. 482332 (Oil Water Separator)

- OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
- THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
- THE VOLUME OF FEED WATER PROCESSED BY THIS EQUIPMENT SHALL NOT EXCEED 173,200 GALLONS IN ANY ONE CALENDAR MONTH.
- MATERIALS PROCESSED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY COMPOUNDS IDENTIFIED AS CARCINOGENIC IN RULE 1401, TABLE 1, AS AMENDED ON JUNE 5, 2009.
- RECORDS SHALL BE MAINTAINED TO PROVE COMPLIANCE WITH THE ABOVE PERMIT CONDITIONS. THE RECORDS SHALL BE KEPT FOR A MINIMUM OF THE LAST TWO YEARS AND SHALL BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

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Application Nos. 495358 (Cement Silo # 3)

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THE TOTAL QUANTITY OF CEMENT RECEIVED AND STORED BY THIS EQUIPMENT SHALL NOT EXCEED 750 TONS IN ANY ONE CALENDAR MONTH.
4. RECORDS SHALL BE MAINTAINED TO PROVE COMPLIANCE WITH THE ABOVE PERMIT CONDITIONS. THE RECORDS SHALL BE KEPT FOR A MINIMUM OF THE LAST TWO YEARS AND SHALL BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

S.A. RECYCLING, ANAHEIM
ID# 153095
PM10 EMISSIONS

A/N	Equipment	PM10 current lb/day	PM10 current lb/yr	Previous PM10 lb/day	Previous PM10 lb/yr	Previous Permit	Change lb/day	Change lb/yr
473504	Waste Gasoline Storage Tank	0	0	0	0	G1160	0	0
482553	Shredder	4	1457	4	1457	a/n 424984	0	0
482555	Dry Filter	0	0	0	0	a/n 484985	0	0
482318	Material Separation	5.24	1886	1	260	M33067	4.24	1626
482325	Cement Silo #1	0.26	81	0.1	10.4	D63904	0.16	70.6
482328	Cement Silo #2	0.26	81	0	0	None	0.26	81
482329	Cement Blending	1.28	437	0	0	None	1.28	437
482330	Misc. Conveying #1	1.22	444	0	0	None	1.22	444
482331	Misc. Conveying #2	1.22	444	0	0	None	1.22	444
482332	Oil/ Water Separator	0	0	0	0	F46124	0	0
495358	Cement Silo #3	0.13	41	0	0	None	0.13	41
495678	APC System- RTO	0.02	6.24	0	0	None	0.02	6.24
	TOTAL	13.63	4877.24	5.1	1727.4		8.53	3149.8